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18 UNITED STATES DISTRICT COURT
19 DISTRICT OF NEVADA

20 Cung Le, Nathan Quarry, Jon Fitch, Brandon
21 Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
22 others similarly situated,

23 Plaintiffs,

24 v.

25 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

26 Defendant.
27
28

Case No.: 2:15-cv-01045-RFB-(PAL)

**JOINT MOTION TO
PROVISIONALLY SEAL
PLAINTIFFS' OPPOSITION TO
ZUFFA, LLC'S MOTION TO
SEAL PLAINTIFFS' OPPOSITION
TO ZUFFA, LLC'S MOTION FOR
SUMMARY JUDGMENT (ECF
NO. 604)**

1 On October 3, 2018, Defendant Zuffa, LLC (“Zuffa”) filed its Motion to Seal Plaintiffs’
2 Opposition to Zuffa, LLC’s Motion for Summary Judgment (ECF No. 602) (the “Motion to
3 Seal”). On October 17, 2018, Plaintiffs filed their Opposition to Defendant Zuffa, LLC’s Motion
4 to Seal Plaintiffs’ Opposition to Zuffa, LLC’s Motion for Summary Judgment and Related
5 Materials (ECF No. 604) (the “Opposition”). Plaintiffs’ Opposition to Zuffa’s Motion to Seal
6 refers to documents that Zuffa and third parties have designated Confidential or Highly
7 Confidential (the “Disputed Materials”) pursuant to the Revised Stipulation and Protective Order
8 issued by this Court on February 10, 2016 (ECF No. 217) (the “Protective Order”). In its Motion
9 to Seal, Zuffa asserted that the Disputed Materials are properly sealed under the compelling
10 reasons standard. As stated in Plaintiffs’ Opposition, Plaintiffs do not believe Zuffa’s
11 confidentiality designations meet the compelling reasons standard, and oppose sealing the
12 Disputed Materials for that reason. However, solely for the limited reason that the documents, as
13 they currently stand, are still designated Confidential or Highly Confidential, Plaintiffs do not
14 oppose Zuffa’s request in this joint motion that the documents—and references to them in
15 Plaintiffs’ Opposition—remain under seal, in accordance with the Protective Order, until the
16 Court has ruled on whether Zuffa has provided compelling reasons to seal them. Plaintiffs
17 continue to reserve their right to challenge Zuffa’s confidentiality designations pursuant to
18 Section 6.1 of the Protective Order.

19 Zuffa and Plaintiffs (collectively, the “Parties”) have stated their positions at length
20 regarding the confidentiality and propriety of sealing the Disputed Materials, and consider the
21 matter fully briefed. Now, in the interest of avoiding unnecessary paperwork, and having met and
22 conferred on this issue, the Parties jointly move to file the Disputed Materials and all references
23 to them in Plaintiffs’ Opposition to the Motion to Seal conditionally under seal, pending the
24 Court’s ruling on the Parties’ respective motions regarding sealing. Should the Court determine
25 that any of the materials filed under seal in the Plaintiffs’ Opposition to Zuffa’s Motion for
26 Summary Judgment should not be sealed, Plaintiffs will re-file these materials on the public
27 docket at that time.
28

Dated: October 22, 2018

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By: /s/ Kevin E. Rayhill

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ATTESTATION OF FILER

The signatories to this document are myself and Kevin Rayhill, and I have obtained Mr. Rayhill's concurrence to file this document on his behalf.

Dated: October 22, 2018

/s/ Stacey K. Grigsby

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Joint Motion to Provisionally Seal Plaintiffs' Opposition to Zuffa, LLC's Motion to Seal Plaintiffs' Opposition to Zuffa, LLC's Motion for Summary Judgment was served on October 22, 2018 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Brent K. Nakamura

Brent K. Nakamura